

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

**Wilmington Savings Fund Society, FSB,
d/b/a Christiana Trust, not individually but
as trustee for Premium Mortgage Acquisition
Trust**

CIVIL ACTION NO: 2:21-cv-00209-JDL

Plaintiff

**PLAINTIFF'S MOTION TO EXTEND
TIME TO COMPLETE SERVICE OF
PROCESS ON THE DEFENDANT,
CONCORDE ACCEPTANCE
CORPORATION**

vs.

**RE:
16 Union Court, Boothbay Harbor, ME
04538**

**Christopher M. Thonet; Dieuwertje W.
Thonet;
and Concorde Acceptance Corporation**

**Mortgage:
August 23, 2004
Book 3358, Page 174**

Defendants

**Damarsicotta Montessori School;
Christopher M. Thonet, as trustee of The
CT DT LLC Trust, dated May 7, 2020; and
Dieuwertje W. Thonet, as trustee of The CT
DT LLC Trust, dated May 7, 2020**

Party-In-Interest

NOW COMES the Plaintiff in this matter, Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Premium Mortgage Acquisition Trust, by and through undersigned counsel, and hereby respectfully requests than an order be entered granting this Motion to Extend Deadline for sixty (60) days to Complete and File Service as to Defendant, Concorde Acceptance Corporation.

1. The Complaint of Foreclosure was filed on July 29, 2021.
2. Service of the Defendant, Concorde Acceptance Corporation, was attempted, but to date

has been unsuccessful.

3. On October 5, 2021, the process server, Nationwide Court Services, notified the undersigned that the Defendant could not be found at 7929 Brookriver Drive, Suite 500, Dallas, TX 75247.
4. A review of the Maine Secretary of State corporate name search revealed the Defendant filed an application of withdrawal by foreign entity on September 13, 2006.
5. Further online review revealed the Defendant dissolved on July 24, 2009.
6. The undersigned is performing additional research to determine if there is an agent or entity that can accept service on behalf of the Defendant.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court grant an additional sixty (60) days to allow for proper service of Defendant, Concorde Acceptance Corporation, with a copy of the Complaint and Summons.

DATED: October 28, 2021

/s/Reneau J. Longoria
John A. Doonan, Esq., Bar No. 3250
Reneau J. Longoria, Esq., Bar No. 5746
Attorneys for Plaintiff
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CERTIFICATE OF SERVICE

I, Reneau J. Longoria, Esq., hereby certify that on this 28th day of October, 2021 I served a copy of the above document by electronic notification using the CM/ECF system and/or First Class Mail to the following:

/s/ Reneau J. Longoria, Esq.
Reneau J. Longoria, Esq., Bar No. 5746
Attorneys for Plaintiff
Doonan, Graves & Longoria, LLC
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Beverly, MA 01915
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SERVICE LIST

Christopher M. Thonet
175 Heath Road
Saco, ME 04072

Christopher M. Thonet
16 Union Court
Boothbay Harbor, ME 04538

Damarsicotta Montessori School
93 Center Street
Nobleboro, ME 04555

Concorde Acceptance Corporation
7929 Brookriver Drive, Suite 500
Dallas, TX 75247

Dieuwertje W. Thonet
175 Heath Road
Saco, ME 04072

Dieuwertje W. Thonet
16 Union Court
Boothbay Harbor, ME 04538

Dieuwertje W. Thonet, as trustee of The CT DT LLC Trust, dated May 7, 2020
175 Heath Road
Saco, ME 04072

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